



November 18, 2016

**BY ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Terrestrial use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks; Amendments to Rules for the Ancillary Terrestrial Component of Mobile Satellite Services, *IB Docket No. 13-213, RM-11685.***

Dear Ms. Dortch,

Hughes Network Systems, LLC (“Hughes”) respectfully submits these comments in support of Globalstar, Inc.’s (“Globalstar”) November 2016 written *ex parte* presentation requesting that the Commission narrow the relief originally requested in the November 2013 *NPRM*<sup>1</sup> to allow Globalstar to use its 11.5 MHz of licensed mobile satellite service (“MSS”) spectrum at 2483.5-2495 MHz for low-power terrestrial broadband services.<sup>2</sup> As a manufacturer of Globalstar and MSS equipment, Hughes supports removing the outdated regulatory barriers in order to increase the efficient use of spectrum, address rapidly growing data usage, and provide consumers with additional terrestrial broadband capacity.

The Commission has repeatedly recognized that America’s demand for mobile broadband services has grown rapidly in recent years – and will continue to do so in the near future.<sup>3</sup> Increasing the utility of the Big LEO band and unlicensed operations in the adjacent 2473-2483.5 MHz band will help to address these concerns. Terrestrial use of MSS spectrum can help alleviate the “urgent need” for network capacity and sustainable spectrum. Hughes therefore believes that rule changes to enable broadband use of the 2.4 GHz band serves the public interest.

Hughes generally supports Globalstar’s proposal to amend Part 25 to permit Globalstar to provide terrestrial operations in the 2483.5-2495 MHz band. These rule changes would enable

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<sup>1</sup> See Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks; Amendments to Rules for the Ancillary Terrestrial Component of Mobile Satellite Service Systems, Notice of Proposed Rulemaking, IB Docket No. 13-213; RM-11685 (rel. Nov. 1 2013) (“*NPRM*”).

<sup>2</sup> Written Ex Parte of Globalstar, Inc. (Nov. 9 2016) (“*Ex Parte*”).

<sup>3</sup> See, e.g., *Service Rules for Advanced Wireless Services in the 2000-2020 MHz and 2180-2200 MHz Bands*, WT Docket Nos. 12-70, 04-356, ET Docket No. 10-142, *Report and Order and Order of Proposed Modification*, 27 FCC Rcd. 16102, 16104-05 ¶¶ 3-4 (2012) (“*AWS-4 Report and Order*”); *Statement of Commissioner Ajit Pai*, Amendment of Part 27 of the Commission’s Rules to Govern the Operation of Wireless Communications Services in the 2.3 GHz Band, WT Docket No. 07-293, IB Docket No. 95-91, *Order on Reconsideration*, 27 FCC Rcd. 13651, 13753 (2012); *Statement of Chairman Julius Genachowski*, Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, Docket No. 12-268, *Notice of Proposed Rulemaking*, 27 FCC Rcd. 12357, 12546-47 (2012); FCC Staff Technical Paper, Mobile Broadband: The Benefits of Additional Spectrum, at 2, 5 (Oct. 2010), available at <http://www.fcc.gov/document/mobile-broadband-benefits-additionalspectrum>; Connecting America: The National Broadband Plan, at 76-77 (2010) (“*The National Broadband Plan*”), available at [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-296935A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-296935A1.pdf).

Globalstar to deploy low-power broadband service in the 2473-2495 MHz band and would serve the public interest by increasing spectrum utility and deployment.

These rule changes to facilitate broadband use in the 2.4 GHz band serve the public interest by increasing the efficient use of the available spectrum while providing an additional means to help satiate the ever growing consumer data demand. For the foregoing reasons, Hughes generally supports Globalstar's proposals that would enable it to deploy a low-power broadband service in the 2473-2495 MHz band.

Respectfully submitted,

*/s/ Jennifer A. Manner*

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